

## REMARKS

Claims 1, 4, 7, 8, and 10 have been amended.

Claims 12-23 have been withdrawn.

Claims 1-23 are currently pending in this application.

Claims 1, 4, 8, 10, 12, 18, and 21 are in independent form.

### **1. Rejections Under 35 U.S.C. § 102**

#### **a. Claims 1-11**

The Examiner's rejection of Claims 1-11 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,728,609 B2 to *Murray et al.* is respectfully traversed.

The Examiner's stated basis for the rejection of independent Claim 1 is that the '609 *Murray et al.* reference discloses an improved machine vision vehicle wheel alignment system having all of the components of Claim 1.

The MPEP §2131 provides:

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described in a single prior art reference." *Verdegall Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as contained in the ... claim" *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236 9 USQP2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim.

Contrary to the Examiner's statements that all elements of independent Claim 1 are disclosed by the '609 *Murray et al.* reference, at least the required limitations of a movable vehicle service apparatus on which is mounted at least one additional camera, and a computer configured to use images of an optical target received from the additional camera to guide placement of the moveable vehicle service apparatus

relative to the vehicle are not disclosed. The '609 *Murray et al.* reference is directed to a method and system for diagnosing a vehicle multi-link steering system. The figure and passages cited by the Examiner detail an optical wheel alignment system wherein cameras on the wheel alignment system observe optical targets disposed on the steerable wheels of a vehicle to determine positional parameters associated with the vehicle steerable wheels. The '609 *Murray et al.* reference fails to disclose a movable vehicle service apparatus which is separate from the vehicle wheel alignment system, and further fails to disclose that images of optical targets acquired by a camera on the movable vehicle service apparatus are utilized by the vehicle wheel alignment system computer to guide the placement of the movable vehicle service apparatus relative to the vehicle. Accordingly, independent Claim 1, as amended, is not anticipated under 35 U.S.C. § 102(e) by the '609 *Murray et al.* reference.

Dependent Claims 2 and 3 each depend directly from independent Claim 1, and accordingly, are seen as novel over the '609 *Murray et al.* reference for at least the same reasons as Claim 1, and for the additional reasons set forth below.

Dependent Claim 2 requires the computer of the vehicle wheel alignment system to be configured to guide the placement of the movable vehicle service apparatus relative to a rear thrust line of the associated vehicle. The passages cited by the Examiner at Col. 3, lines 53-57 merely describe how the '609 *Murray et al.* system is configured to compare observed parameters of a vehicle steered wheels with related specifications to determine the operational status of the vehicle steering system. The cited passages fail to disclose a separate vehicle service apparatus, and further fail to

disclose a computer configured to guide placement of the vehicle service apparatus relative to a vehicle thrust line.

Dependent Claim 3 requires the movable vehicle service apparatus to be a vehicle collision avoidance system alignment fixture. The '609 *Murray et al.* reference fails to disclose a vehicle service apparatus which is a vehicle collision avoidance system alignment fixture, and the Examiner fails to cite any specific portion of the '609 *Murray et al.* reference in support of the rejection.

Contrary to the Examiner's statements that all elements of independent Claim 4 are disclosed by the '609 *Murray et al.* reference, at least the required limitations of a movable vehicle service apparatus on which is mounted at least one optical target, and a computer configured to use images of the optical target on the vehicle service apparatus, received from the alignment system camera to guide placement of the moveable vehicle service apparatus relative to the vehicle are not disclosed. The '609 *Murray et al.* reference is directed to a method and system for diagnosing a vehicle multi-link steering system. The figure and passages cited by the Examiner detail an optical wheel alignment system wherein cameras on the wheel alignment system observe optical targets disposed on the steerable wheels of a vehicle to determine positional parameters associated with the vehicle steerable wheels. The '609 *Murray et al.* reference fails to disclose a movable vehicle service apparatus which is separate from the vehicle wheel alignment system, and further fails to disclose that images of an optical target on the movable vehicle service apparatus are acquired by the alignment system camera to be utilized by the vehicle wheel alignment system computer to guide the placement of the movable vehicle service apparatus relative to the vehicle.

Accordingly, independent Claim 4, as amended, is not anticipated under 35 U.S.C. § 102(e) by the '609 *Murray et al.* reference.

Dependent Claims 5, 6, and 7 each depend directly from independent Claim 4, and accordingly, are seen as novel over the '609 *Murray et al.* reference for at least the same reasons as Claim 4, and for the additional reasons set forth below.

Dependent Claim 5 requires the computer of the vehicle wheel alignment system to be configured to guide the placement of the movable vehicle service apparatus relative to a rear thrust line of the associated vehicle. The passages cited by the Examiner at Col. 3, lines 53-57 merely describe how the '609 *Murray et al.* system is configured to compare observed parameters of a vehicle steered wheels with related specifications to determine the operational status of the vehicle steering system. The cited passages fail to disclose a separate vehicle service apparatus, and further fail to disclose a computer configured to guide placement of the vehicle service apparatus relative to a vehicle thrust line.

Dependent Claim 6 requires the movable vehicle service apparatus to be a vehicle collision avoidance system alignment fixture. The '609 *Murray et al.* reference fails to disclose a vehicle service apparatus which is a vehicle collision avoidance system alignment fixture, and the Examiner fails to cite any specific portion of the '609 *Murray et al.* reference in support of the rejection.

Dependent Claim 7 requires that the camera on the vehicle wheel alignment system have an adjustable field of view to selectively view (1) an optical target mounted to a vehicle; or (2) the additional optical target mounted to the movable vehicle service apparatus. The Examiner's rejection of Claim 7 is based on Figure 3 of the '609 *Murray*

*et al.* reference, however, Figure 3 fails to show a movable vehicle service apparatus, and accordingly, fails to show optical targets mounted to such a service apparatus as well as a camera having an adjustable field of view which is selective between the vehicle-mounted optical targets and a service apparatus-mounted optical target. Accordingly, dependent Claim 7 is seen as novel over the '609 *Murray et al.* reference.

With regard to independent method Claims 8 and 10, the Examiner has not set forth any specific details for rejection of the claims in view the '609 *Murray et al.* reference. Rather, the Examiner has merely stated, in the context of rejecting dependent Claims 9 and 11, that "... Murray discloses the method for aligning a vehicle service apparatus of Claim 8 ..."

Independent Claim 8 sets forth a method for aligning a movable vehicle service apparatus relative to a vehicle wherein images of optical targets mounted on the vehicle are acquired by a camera mounted on the movable vehicle service apparatus, and are used to guide the placement of the movable vehicle service apparatus relative to the vehicle. Independent Claim 10 is similar to Claim 8, but rather requires images of optical targets mounted to the movable vehicle service apparatus to be acquired and processed, together with images of optical targets mounted to the vehicle, to guide the placement of the movable vehicle service apparatus relative to the vehicle. As set forth above in the discussion of independent Claims 1 and 4, the '609 *Murray et al.* reference fails to disclose a movable vehicle service apparatus which is guided into position relative to a vehicle, hence, the '609 *Murray et al.* reference similarly fails to disclose any method for guiding placement of a movable vehicle service apparatus. Similarly, with respect to dependent Claims 9 and 11, the '609 *Murray et al.* reference fails to

disclose any method for guiding placement of a movable vehicle service apparatus relative to a vehicle rear thrust line. Accordingly, Claims 8-11 are not anticipated under 35 U.S.C. § 102(e) by the '609 *Murray et al.* reference.

**b. Claims 8 and 10**

The Examiner's rejection of Claims 8 and 10 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,731,382 B2 to *Jackson et al.* is respectfully traversed. The Examiner's stated basis for the rejection of both Claim 8 and Claim 10 is that the '382 *Jackson et al.* reference discloses each and every limitation of the claims at Cols. 7, lines 1-21 and Col. 9, lines 1-25.

The '382 *Jackson et al.* reference fails to disclose a movable vehicle service apparatus which is separate from a vehicle wheel alignment system configured to guide the placement of the movable vehicle service apparatus relative to a vehicle during a service procedure. The '382 *Jackson et al.* reference is directed to a "five-camera" alignment system in which the relative positioning of left and right camera pods relative to each other are calibrated using a single camera observing both the left and right camera pods. (See: Abstract) There is no disclosure in the '382 *Jackson et al.* reference of a movable vehicle service apparatus which is separate from the vehicle wheel alignment system, or of a vehicle wheel alignment system being configured to guide the placement of the movable vehicle service apparatus relative to the vehicle. Accordingly, the '382 *Jackson et al.* reference fails to anticipate independent Claims 8 and 10 under 35 U.S.C. § 102(e).

**2. Conclusion**

Based on the foregoing, allowance of Claims 1-11 is requested. If for any reason the Examiner is unable to allow the application on the next Office Action and feels that an interview would be helpful to resolve any issues, the Examiner is respectfully requested to contact the undersigned attorney for the purpose of arranging such an interview.

Respectfully submitted,

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